

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

JOE HAND PROMOTIONS INC
PLAINTIFF

*

VS.

*

1: 07 CV 702-MEF

JOHN PFAU, ET AL.
DEFENDANTS

*

AMENDED ANSWER

Come the defendants John Pfau and MVP Sports, Inc. and in answer to the amended complaint show unto the court as follows:

1. The defendants admit that the cause of action implicates a Federal Statute and jurisdiction is proper pursuant to 28 USC 1331.
2. The defendants are without sufficient knowledge to either admit or deny paragraph six (6), paragraph ten (10), paragraph eleven (11), paragraph twelve (12) of the complaint. Defendant specifically denies paragraph three (3) to the extent that it is predicated upon conduct that the defendant is alleged to have committed. The defendant denies paragraph five (5) to the extent that it is predicated upon conduct the defendant is alleged to have committed. The defendant specifically denies the existence of any entity known as MVP Sports Lounge Inc. and shows unto the Court that the proper corporate name is MVP Sports, Inc.
3. The defendants specifically denies the allegations contained in paragraph thirteen (13) of the complaint the defendant specifically denies any violation of 47 USC Section 605 and specifically denies that the plaintiff has a right of action against the defendant pursuant to said statute.
4. The defendants specifically denies the allegations contained in paragraph seventeen (17) the defendant specifically denies allegations contained in paragraph twenty (20) and specifically denies any conduct in violation of 47 USC Section 553 et seq. The defendant specifically denies paragraph twenty one (21) of the complaint.
5. The defendants specifically denies paragraph twenty- two (22) of the complaint and specifically denies that the plaintiff is entitled to any recovery of any damages as articulated in paragraph twenty-two (22) and its subdivisions.
6. The defendants specifically deny that an electronic signal is capable of being converted as set out in paragraph twenty-four (24). The defendant specifically denies that he intercepted any such signal as described in paragraph twenty-four (24). The defendants specifically deny that any act is malicious or intentional or that any act of

the defendants subjected the plaintiff to economic distress or was designed to intentionally harm the plaintiff. The defendants specifically deny any claim pursuant to paragraph thirty (30) of the complaint or that his conduct was in any way egregious or constituted a conversion of property. The defendants deny each and every request of the prayer for relief and deny that the plaintiff is entitled to the award of any damages pursuant to the claims made in the civil action filed against the defendant. The defendants deny that the plaintiff is entitled to any attorney's fees pursuant to the third count of the complaint.

5. The defendants show the court evidence of wrongdoing has been sought of the plaintiff and plaintiff has failed to provide evidence of wrongdoing. Plaintiff's claims are without foundation, this suit is frivolous and costs should be assessed pursuant to the Alabama Legal Accountability Act, and the defendant should be held harmless from all costs, expenses and attorney fees arising in this civil action.

S/Charles N. Reese
Charles N. Reese, (REE010)
Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing pleading on Keith Anderson Nelms, Esq. by the electronic filing system this the 16th day of October 2007.

S/Charles N. Reese
Charles N. Reese